

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

|                           |   |                               |
|---------------------------|---|-------------------------------|
| <b>IN RE:</b>             | : | <b>CHAPTER 13</b>             |
| <b>RYAN MICHAEL TRONE</b> | : |                               |
|                           | : | <b>CASE NO. 1:18-bk-05174</b> |
|                           | : |                               |
| <b>Debtor</b>             | : |                               |
|                           | : |                               |

**AMENDED MOTION FOR ORDER TO PAY TRUSTEE**

Comes now Ryan Michael Trone by and through Kara K. Gendron, Esquire of Mott & Gendron Law, and requests an Order to pay Trustee, respectfully representing in support thereof:

1. The Debtor filed a Chapter 13 petition on at the above-captioned docket number.
2. The Debtor receives regular income from employment which may be attached under 11 U.S.C. Section 1326 to fund the Chapter 13 Plan.
3. The likelihood of success in this case will be much greater if the income is attached to fund the Plan.
4. The Debtor consents to the wage attachment.

Wherefore, the Debtor respectfully requests that this Court enter an Order to pay Trustee in the form attached.

Respectfully submitted,

/s/ Kara K. Gendron  
Kara K. Gendron, Esquire  
Attorney ID # 87577  
Mott and Gendron Law  
125 State Street  
Harrisburg PA 17101  
(717) 232-6650 Tel  
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| <b>RYAN MICHAEL TRONE</b> | : |                               |
|                           | : | <b>CASE NO. 1:18-bk-05174</b> |
| <b>Debtor</b>             | : |                               |
|                           | : |                               |
|                           | : |                               |

**AMENDED ORDER TO PAY TRUSTEE**

Upon consideration of the Motion for Wage attachment, it is hereby ordered that until further Order of this Court the entity from whom the Debtor, Ryan Michael Trone receives income:

GETTYSBURG SCHOOL DISTRICT  
ATTN: PAYROLL DEPARTMENT  
900 BIGLERVILLE ROAD  
GETTYSBURG, PA 17325

deduct from said income the sum of \$269.00 from each bi-week pay check beginning on the next pay day following receipt of this Order and deduct a similar amount each pay period thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination or other benefits arising out of present or past employment, or from any other benefits payable to the Debtor and to remit the deductible sums to:

CHARLES J DEHART III ESQUIRE  
PO BOX 7005  
LANCASTER, PA 17604

It is further ordered that the employer shall change the amount of the monthly remittance to the Trustee in the future, if the Employer is directed to do so in writing, either by the Trustee or by the Debtor's counsel and to continue the wage attachment until the Employer is directed in writing to discontinue the attachment, either by the Trustee or Debtor's counsel. It is further ordered that the entity from whom the Debtor receives income shall notify the Trustee if the Debtor's income is terminated and the reason therefore. It is further ordered that all remaining income of the Debtor, except the amounts required to be withheld for taxes, social security, insurance, pension, or union dues be paid to the Debtor in accordance with usual payment procedure. It is further ordered that this Order shall terminate without further order upon certification that the obligation of the Debtor has been fulfilled, if it is not terminated by earlier order of this Court.

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:** : **CHAPTER 13**  
**RYAN MICHAEL TRONE** :  
: **CASE NO. 1:18-bk-05174**  
:  
:  
**Debtor(s)** :

**CERTIFICATE OF SERVICE**

I certify that on 1/7/2020 I served a copy of the foregoing document(s) on the following parties:

| <b>Name and Address</b>  | <b>Mode of Service</b>            |
|--|-----------------------------------|
| CHARLES J DEHART, III, TRUSTEE   | Electronically                    |
| GETTYSBURG SCHOOL DISTRICT<br>ATTN: PAYROLL DEPARTMENT<br>900 BIGLERVILLE ROAD<br>GETTYSBURG, PA 17325 | First Class Mail, Postage Prepaid |

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Kara K. Gendron,  
Kara K Gendron, Esq.  
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125 State Street  
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karagendron@gmail.com